

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Kiawah Island Utility Company  
Incorporated for Adjustment of Rates and Charges

232105 SA  
BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2011 - 317 - W/S

(Please type or print)

Submitted by: Michael A. Molony

SC Bar Number: 4026

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Charleston, SC 29401

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Other: \_\_\_\_\_

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

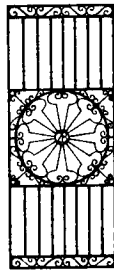
- ☐ Emergency Relief demanded in petition      ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☒ Other: Petition to Intervene and Request for a Hearing within the Company's service area

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input checked="" type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input checked="" type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

RECEIVED  
MAIL / DMS

CHARLESTON  
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**YOUNG  
CLEMENT  
RIVERS LLP  
ATTORNEYS AT LAW**

**Michael A. Molony**

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September 7, 2011

**CERTIFIED MAIL; RETURN RECEIPT REQUESTED**

Jocelyn Boyd  
Chief Clerk & Administrator  
South Carolina Public Service Commission  
P. O. Box 11649  
Columbia, SC 29211

Re: Kiawah Property Owners Group, Inc., Petition to Intervene  
Application for Rate Increase of Kiawah Island Utility  
PSC Docket No. 2011-317-W/S  
YCR: 2589-20110772

Dear Ms. Boyd:

I am enclosing an original and ten copies of the Petition to Intervene, along with a Request for a Night Hearing in connection with the above referenced Docket. These are filed pursuant to S.C. Reg. § 103-825 (3).

Please acknowledge receipt of these items and let me know if you need anything further to post them on the Docket.

I am providing a Certificate of Service, indicating all parties of record have been provided with these pleadings.

With kind regards, I am

Sincerely,

Young Clement Rivers, LLP

Michael A. Molony

MAM/cs

Enclosure(s)

cc: G. Trenholm Walker, Esquire  
Shannon Bowyer Hudson, Esq. (ORS)  
Shealy Boland Reibold, Esq. (ORS)  
Diane Z. Lehder  
Wendy Kulick

BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
Docket No. 2011-317-W/S

IN RE:	)	
	)	
Application of Kiawah Island	)	PETITION TO INTERVENE
Utility Company for Adjustment of	)	AND PROTEST
Rates	)	
	)	
	)	
	)	

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The Petitioner, KIAWAH PROPERTY OWNERS GROUP, INC., would respectfully show unto the Commission:

1. That the Petitioner is a non-profit corporation formed under the laws of the State of South Carolina whose membership consists of over 1900 members, representing 3613 residents and property owners on Kiawah Island, County of Charleston, State of South Carolina. The address of the Petitioner is 306 Palm Warbler Rd, Kiawah Island, Johns Island, South Carolina 29455.

2. That the Petitioner is directly affected by this proposed rate increase in that the applicant's service area encompasses that of the Petitioner's membership. Moreover, the Petitioner's members are subscribers of the utility service of the applicant.

3. That the authorized representative for the Petitioner is:

Diane Z. Lehder  
President, Kiawah Property Owners' Group, Inc.  
306 Palm Warbler Rd., Kiawah Island  
Johns Island, S.C. 29455

and  
Michael A. Molony, Esquire  
Young Clement Rivers, LLP  
28 Broad Street  
Charleston, South Carolina 29201  
(843) 724-6631; (843) 577-4000

4. That the Petitioner does not have sufficient information on this Application for Adjustment of Rates and therefore protests the rate adjustment at this time and requests leave to participate in all proceedings before the Commission with respect to this Docket.

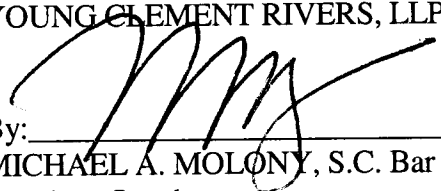
5. That the Petitioner estimates that it will take approximately three hours to present its case to the Commission.

WHEREFORE, the Petitioner respectfully requests:

- a) That the Commission issue an Order allowing the Petitioner to intervene in this proceeding;
- b) That based on the limited information available, Kiawah Property Owners Group is unable to support the proposed rate adjustment and protests it at this time;
- c) That the Petitioner be granted all rights and privileges appertaining as intervenors including, but not limited to, notice of all further matters involving this proceeding;
- d) For such other and further relief as the Commission may deem just and proper.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:   
MICHAEL A. MOLONY, S.C. Bar #4026  
mmolony@yclaw.com  
28 Broad Street  
P. O. Box 993  
Charleston, SC 29402  
(843) 724-6631

Charleston, South Carolina

Dated: 9/21, 2011

BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
Docket No. 2011-317-W/S

CERTIFICATE OF MAILING

We hereby certify that on this 7<sup>th</sup> day of September, 2011, we served a copy of the foregoing Petition to Intervene and Protest upon:

G. Trenholm Walker, Esquire  
Pratt-Thomas, Pearce, Epting, & Walker  
P.O. Drawer 22247  
Charleston, South Carolina 29413-2227

Shealy Boland Reibold, Esquire  
Counsel, Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

Shannon Bowyer Hudson, Esquire  
Counsel, Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

by first class mail, postage prepaid.

DATED at Charleston, South Carolina, this 7th day of September, 2011.



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MICHAEL A. MOLONY, ESQUIRE  
Young Clement Rivers, LLP  
28 Broad Street, P.O. Box 993  
Charleston, South Carolina 29401

Charleston, South Carolina